

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,  
et al.,

Defendants.

Case No. 5:15-CV-00634-G

**JOINT MOTION FOR SCHEDULE EXTENSION**

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1(h), Lead Plaintiffs Ivan Nibur, Deborah Rath, Jase Luna, Matthew Willenbucher, Reed Romine, and the Duane & Virginia Lanier Trust (collectively, “Plaintiffs”), and Defendants Tom L. Ward (“Ward”), Matthew K. Grubb (“Grubb”), and James D. Bennett (“Bennett”) (collectively, “Defendants” and, together with Plaintiffs, the “Parties”), by and through their undersigned counsel, respectfully move the Court for an Order extending the current schedule for Plaintiffs to file their motion and briefing in support of preliminary settlement approval from November 12, 2021 (ECF No. 459) to November 16.

The Parties are in the process of finalizing a small number of remaining issues related to the stipulation of settlement and exhibits, but anticipate that Plaintiffs will be able to file for preliminary approval of the Settlement in short order. The Parties therefore

request a very short extension of the November 12 deadline by two business days, to November 16, in order to finalize, and secure approval of, the stipulation of settlement and its exhibits.

### **RELIEF REQUESTED**

The Parties have stipulated to a modest extension of the deadline for Plaintiffs' preliminary settlement approval motion and briefing, pending approval by the Court, as set forth in the chart below. The Parties hereby request that the deadline for filing Plaintiffs' preliminary settlement approval papers be modified from on or before November 12, 2021 to on or before November 16, 2021.

Good cause exists to modify the current schedule. The Parties are diligently continuing to finalize the terms of their settlement and require additional time to complete definitive documentation of their settlement agreement, including exhibits and notices to the class, so that they can continue to work towards a successful global resolution of the instant litigation and the related *Glitz* Action.

A proposed order is filed herewith.

Deadline	Current Date	Proposed Date
Plaintiffs to file their motion for preliminary approval of the settlement	November 12, 2021	November 16, 2021

DATED: November 12, 2021

Respectfully submitted,

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Phillip Kim, Esq. (admitted *pro hac vice*)  
Jonathan Horne, Esq. (admitted *pro hac vice*)

*/s/Jonathan Horne*

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Dated: November 12, 2021

/s/J. Christian Word

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2021, I electronically transmitted the attached Joint Motion for Schedule Extension using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

*/s/ J. Christian Word*

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J. CHRISTIAN WORD